

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ALEXIS LARA HERRERA,

Defendant

)
) Criminal No. 24cr10211

)
) Violation:

) Count One: Smuggling Goods from the United
) States; Aiding and Abetting
) (18 U.S.C. §§ 554(a) and 2)

) Smuggling Goods Forfeiture Allegation:
) (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
) § 2461(c))
)

INDICTMENT

COUNT ONE

Smuggling Goods from the United States;
Aiding and Abetting
(18 U.S.C. §§ 554(a) and 2)

The Grand Jury charges:

Beginning on or about October 3, 2022, and continuing through on or about March 23, 2023, in the District of Massachusetts and elsewhere, the defendant,

ALEXIS LARA HERRERA,

did fraudulently and knowingly export and send from the United States, and attempted to export and send, any merchandise, article, and object contrary to any law and regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article, and object, prior to exportation, knowing the same to be intended for exportation, to wit: a Glock G45 – 9mm (serial # BKDM599), a Glock 34 GEN 5 – 9mm (serial # BXST588), a Glock 19 GEN 5 MOS – 9mm (serial # BZCC103), a Glock 19 GEN 5 MOS – 9mm (serial # BZCC077), and 500 Rounds of 9mm Ammunition, without first having obtained the required export license and authorization from the United States Department

SMUGGLING GOODS FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 554(a), set forth in Count One, the defendant,

ALEXIS LARA HERRERA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

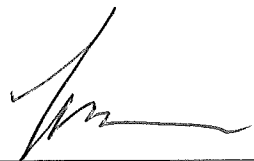
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


LUKE A. GOLDWORM
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JULY 18, 2024
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK 07/18/2024